

494024

GRACE

William M. Corcoran
Vice President
Public and Regulatory Affairs
W. R. Grace & Co.
7500 Grace Drive
Columbia, MD 21044

(410) 531-4203
Fax: (410) 531-4233
email william.corcoran@grace.com

August 13, 2001

Paul Peronard
United States Environmental Protection Agency

Re: Libby, Montana; Completion of work at export plant

Dear Mr. Peronard:

Enclosed please find Grace's addendum to its work plan for the completion of work at the export plant pursuant to EPA's May 17, 2000 Unilateral Order.

By agreeing to complete this work, Grace reserves all its rights with regard to future requests from EPA to conduct additional work under the May 17, 2000 Unilateral Order or any subsequent order. The completion of work at the export plant is a unique situation since work began, but was not completed, pursuant to a pre-petition Unilateral Order.

If you have any questions, please do not hesitate to call.

Sincerely,



William M. Corcoran

WMC:jld

ADDENDUM NO. 13
Work Plan – Removal of Asbestos and vermiculite
At the Export Plant, Libby Asbestos Site
15 August 2001

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the scope of demolition activities pertaining to the structural demolition of structures at the site.

WR Grace will accomplish this demolition in compliance with the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation. URS personnel will provide construction oversight of the work that will be performed by WR Grace subcontractors.

This addendum will also amend the project Health and Safety Plan to include the OSHA requirements for using full safety harness and fall protection during the structural demolition.

For the structural demolition of the buildings, the metal roof will be removed first and "sized" for the transport vehicle. The roof components will be loaded on a flatbed truck, tarped, and transported to the mine site for disposal. Asphaltic roof components will be wetted during remediation and removed in manageable sections, placed in end dump trucks and/or flatbed trucks, tarped, and also transported to the mine site for disposal.

The remaining structural elements and siding materials will be manageably sized and placed on flatbed trucks, tarped, and transported to the mine site for disposal.

ADDENDUM NO. 14
Work Plan – Removal of Asbestos and vermiculite
At the Export Plant, Libby Asbestos Site
15 August 2001

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the scope of footprint demolition activities pertaining to the structural demolition of foundational structures at the site.

WR Grace will accomplish this foundation demolition in compliance with the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation. URS personnel will provide construction oversight of the work that will be performed by WR Grace subcontractors.

For the removal of building foundations and floors, WR Grace will "size" the material to facilitate transport dimensions, placed in end- dump trucks, tarped and transported to the mine site for disposal. . Excavation methods and operations will be in accordance with the original work plan submittals. Underlying soils, if vermiculite is visible, will be excavated, loaded into end dump trucks, tarped, and transported to the mine site for disposal. Backfill of excavated areas will be completed with clean backfill and grades will be restored in accordance with the Work Plan requirements.

ADDENDUM NO. 15
Work Plan – Removal of Asbestos and vermiculite
At the Export Plant, Libby Asbestos Site
28 July 2000

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the scope of West End excavation activities.

WR Grace will accomplish the West End excavation activities in compliance with the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation. URS personnel will provide construction oversight of the work that will be performed by WR Grace subcontractors.

The excavation of soils along the West end property line will be quantified and confirmed through sampling and analysis activities but is not expected to extend further than 10-15 feet from what was excavated under the original scope of work. Excavation methods and operations will be in accordance with the original work plan submittals. Access agreements will be required if suspected materials cross the property lines. All excavated areas will be backfilled with clean material to the existing lines and grades.

ADDENDUM NO. 16
Work Plan – Removal of Asbestos and vermiculite
At the Export Plant, Libby Asbestos Site
15 August 2001

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the scope of Sampling and Monitoring activities during the excavation and removal operations within the specified work areas.

WR Grace will accomplish the Sampling and Monitoring activities in compliance with the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation. URS personnel will provide construction oversight of the work that will be performed by WR Grace subcontractors.

WR Grace will sample areas following excavation to confirm that contamination has been removed. Sampling will be conducted in accordance with the original Sampling and Analysis protocols and grid patterns set forth in the original Work Plan submittals. Additional samples will be taken on a 20' perimeter of the work area in order to identify other surface contamination.

Perimeter air samples will be collected at a maximum of 5 per work area. Area sampling will be conducted at a maximum of 3 samples per work area. OSHA compliance sampling will be conducted on a minimum of 25% of the work force. Where PCM analysis exceeds 0.01 f/cc, results will be confirmed by Transmission Electron Microscopy (TEM).

Poor Quality Source Document

**The following document images
have been scanned from the best
available source copy.**

**To view the actual hard copy, contact the
Superfund Records Center at 303-312-6473**

